



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DEREK AARON GARCIA,

MICHAEL ROY HILLIARD,

SHABORN AMAR "SHY" NESBITT,

RICARDO GLENN "RIP" THORNE,

LARON MECCO "FROG" WEST,

CHARLES EDWARD "CHUCKY"
WILLIAMS, III,

TARRY JERON "TJ" WILSON,

Defendants.

Criminal No. 1:22-cr-154

Count 1: 18 U.S.C. § 371 (Conspiracy)

Counts 2-4: 7 U.S.C. 2156(b) and 18 U.S.C. § 49
(Training and Transporting Dogs for
Participation in an Animal Fighting Venture)

Count 5: 7 U.S.C. 2156(c) and 18 U.S.C. § 49
(Advertising a Dog For Use in an
Animal Fighting Venture)

INDICTMENT

AUGUST 2022 TERM -- AT ALEXANDRIA

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

A. Animal Fighting Ventures and Dogfighting

1. The federal Animal Welfare Act defines "animal fighting venture" as "any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least two animals for purposes of sport, wagering, or entertainment." It is illegal to sponsor or exhibit an animal in an animal fighting venture. It is also illegal to possess, train, sell,

buy, transport, deliver or receive an animal for purposes of having the animal participate in an animal fighting venture.

2. In the United States, dog fighting ventures almost always involve “pit bull”-type dogs, which dog fighters prefer for their compact muscular build, short coat, and the aggression that some display toward other dogs. Generally, a dog fight occurs when two dogs are released by their handlers in a controlled environment to attack each other and fight. The fight ends when one dog withdraws, when a handler “picks up” their dog and forfeits the match, or when one or both dogs die.

3. Generally, dog fighters fight dogs with a goal of obtaining “Champion” or “Grand Champion” status for their dogs, which is achieved by winning three or five fights, respectively.

4. Because of their conditioning and training, dogs used in animal fighting ventures are almost always housed separately from other dogs – in pens, cages, or on chains, so that they will not hurt or kill other dogs when the handler is absent. Heavy chains are often used when restraining dogs to develop neck strength in dogs used for fighting purposes.

5. Generally, dog fighters select the strongest, most capable fighting dogs and selectively breed, sell, and fight only those dogs that display particular traits. Some of these traits are: (1) “gameness” or aggressiveness and propensity to fight other dogs; (2) a willingness to continue fighting another dog despite traumatic and/or mortal injury; and (3) cardiovascular endurance to continue fighting for long periods of time and through fatigue and injury. Dogs displaying these attributes are often bred with other dogs displaying similar traits to enhance the bloodline of these dogs for fighting purposes. Dog fighters generally keep such dogs solely for fighting purposes.

6. Dogs who have been fought may have scars, puncture wounds, swollen faces, or mangled ears. Scars from organized dog fights are commonly found on the face and front legs, as well as on hind ends and thighs.

7. Dogs that lose fights or fail to show “gameness” are often killed. It is not uncommon for dogs that lose matches to be killed in cruel, torturous, and inhumane ways as punishment.

8. Once a dog fighter locates an opponent and agrees upon terms, the match is “hooked,” or set up. The dog then typically undergoes a conditioning process dog handlers refer to as a “keep.” A “keep” is typically conducted for six to eight weeks before the scheduled match and involves a training program including treadmills used to run and exercise the dogs away from public view; weight pulls used to increase the dog’s strength and stamina; devices such as “spring poles” and “flirt poles” to build jaw strength and increase aggression; and the administration of drugs, vitamins, and other medicine. Some of the drugs used include steroids to build muscle mass and aggression. Dogs matched for future fights are expected to achieve their established target weight by the scheduled match, much like in human boxing matches, requiring close attention to a dog’s routine. Training can take place at a dog fighter’s “yard” or indoors away from public view.

B. “The DMV Board” or “The Board”

9. It can be challenging for dog fighters to find an opponent with a dog of the same weight and sex who is looking to fight that dog at the same time of year, and for a wager that is mutually agreeable to both parties. For that reason, dog fighters rely heavily on each other and on extensive networks of contacts to find an opponent who has a dog of the same weight and sex and who is looking to fight that dog at the same time of the year. The practice is known as “calling out a weight.” Dog fighters often “call out a weight” to known dog fighters in several states, to increase their odds of finding a match. “Calling out a weight” is often done over the internet.

10. To maintain contact with each other to discuss dogfighting, to exchange videos about dogfighting, and to arrange dogfights away from the view of law enforcement, the defendants and their conspirators created on the Telegram app private groups they generally referred to as "The DMV Board" or "The Board". The private groups generally referenced as The DMV Board or The Board had as many as 28 members at one time, including defendants DEREK AARON GARCIA, MICHAEL ROY HILLIARD, SHABORN AMAR "SHY" NESBITT, RICARDO GLENN "RIP" THORNE, LARON MECCO "FROG" WEST, CHARLES EDWARD "CHUCKY" WILLIAMS, III, and TARRY JERON "TJ" WILSON, unindicted conspirators Carlos Harvey and Rodriguez Norman, and other unindicted conspirators known as "Abstract", "Big Fist", "Big Head", and "Deep in the Game". The "DMV" designation on the private group name refers to the common location of many members of the group in Virginia, Maryland, and the District of Columbia.

11. The defendants and their conspirators used private groups on the Telegram App generally referenced as "The DMV Board" or "The Board" to communicate about dogfighting with each other daily, often throughout the day. Through the private groups on the Telegram App generally referenced as "The DMV Board" or "The Board" they discussed training techniques to maximize their chances of developing champion fighting dogs; discussed dogfights in which they entered dogs; recounted dogfights that they had seen; watched together and commented on videos of dogfights; "called out weights" to find dogfighting matches; offered and accepted bets on dog fights; recruited each other to officiate at dog fights; discussed the proper procedures for officials to use at dog fights; compared methods of killing dogs that lost fights; discussed which dog fighters could be trusted to join the group; circulated media reports about dogfighters who had been caught by law enforcement, and discussed methods to minimize the likelihood that they would be caught themselves.

12. In their communications on the private groups on the Telegram App generally referenced as “The DMV Board” or “The Board” the defendants and the unindicted conspirators identified below used the following names to refer to themselves and/or their dogfighting operations:

Individual	Name(s) Used
DEREK AARON GARCIA	“Fatal Attraction” or “Derek”
Carlos Harvey	“Roc9”
MICHAEL ROY HILLIARD	“No Dayz Off”, “No Dayz”, or “Roy”
Rodriguez Norman	“Tough Love”
SHABORN AMAR “SHY” NESBITT	“The God I Am”, “Mike Honcho” “Suge Thesenuts” or “Shy”
RICARDO GLENN “RIP” THORNE	“Darkside” or “Rip”
LARON MECCO “FROG” WEST	“Get Sick” or “Frog”
CHARLES EDWARD “CHUCKY” WILLIAMS, III	“Never Say Never” or “Chucky”
TARRY JERON “TJ” WILSON	“City Limits”

COUNT ONE

(Dog fighting Conspiracy)

A. The general allegations of this Indictment are re-alleged and incorporated into this Count as though fully set forth herein.

From in and around May 2015, and continuing to in and around August 2020, in Woodbridge in the Eastern District of Virginia and elsewhere, the defendants, DEREK AARON GARCIA, MICHAEL ROY HILLIARD, SHABORN AMAR “SHY” NESBITT, RICARDO GLENN “RIP” THORNE, LARON MECCO “FROG” WEST, CHARLES EDWARD “CHUCKY” WILLIAMS, III, and TARRY JERON “TJ” WILSON, did knowingly and unlawfully conspire with each other and with Anthony “Monte” Gaines, Carlos Harvey, Rodriguez Norman, and others, known and unknown to the Grand Jury, including individuals known as “Abstract”, “Big Head”, and “Deep in the Game”, to commit the following offenses:

- a. To sponsor and exhibit dogs in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(a), and Title 18, United States Code, Section 49(a);
- b. To sell, buy, possess, train, transport, deliver, and receive dogs for purposes of having the dogs participate in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Section 49(a); and
- c. To use instrumentalities of interstate commerce for commercial speech for purposes of advertising animals for use in animal fighting ventures, promoting and in other manners furthering animal fighting ventures, in violation of Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49(a).

Ways, Manner and Means of the Conspiracy

The manner and means by which the defendants and their conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

1. It was a part of the conspiracy that defendants and their conspirators bred, trained, and used pit bull-type dogs for dog fights.
2. It was a part of the conspiracy that defendants and their conspirators agreed to breed their pit bull-type dogs to pit bull-type dogs owned by their conspirators in the hopes of breeding champion dog fighters.
3. It was a part of the conspiracy that defendants and their conspirators kept at their properties and trained fighting dogs owned by themselves as well as by other conspirators.

4. It was a part of the conspiracy that defendants and their conspirators traveled to dog fights held at properties owned and/or arranged by themselves or other conspirators.

5. It was a part of the conspiracy that defendants and their conspirators bet on dog fights in which were entered dogs bred, trained, or owned by the defendants and their conspirators.

6. It was a further part of the conspiracy that the defendants and their conspirators used cell phones and direct messages to discuss dogfights, dogfighting, breeding fighting dogs, training techniques to maximize their chances of developing champion fighting dogs, and methods to avoid being caught by law enforcement.

7. It was a further part of the conspiracy that the defendants and their conspirators created and used on the Telegram app private groups they generally referred to as "The DMV Board" or "The Board" as places where they and their associates could discuss training fighting dogs, exchange videos about dogfighting, and arrange and coordinate dog fights, away from the view of law enforcement authorities.

8. It was a further part of the conspiracy that, on the Telegram app private groups generally referenced as the "DMV Board" or "The Board", the defendants and their conspirators used the names of their dogfighting operations and/or kennels to refer to themselves as well as to their dogfighting operations and/or kennels.

9. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as "The DMV Board" or "The Board" to discuss and compare training techniques to maximize their chances of developing champion fighting dogs.

10. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to called out weights” to find dogfighting matches.

11. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to offer and accept bets on dog fights.

12. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to recruit each other to officiate at dog fights.

13. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to compare methods of killing dogs that lost fights.

14. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to discuss which dog fighters could be trusted to join the group.

15. It was a further part of the conspiracy that the defendants and their conspirators used the Telegram app private groups they generally referenced as “The DMV Board” or “The Board” to circulate media reports about dogfighters who had been caught by law enforcement and discuss methods to minimize the likelihood that they would be caught themselves.

Overt Acts

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants and their conspirators committed overt acts including but not limited to the following:

1. On or about May 28, 2015, TARRY JERON "TJ" WILSON posted on an on-line website tracking pedigrees of fighting dogs a page with a photo and information for his fighting dog "City Limits Mayweather", characterizing the dog as the offspring of "Never Say Never & City Limits Beaty Bead 1XW".
2. In a phone conversation on or about October 18, 2015, RICARDO GLENN "RIP" THORNE told unindicted conspirator Anthony "Monte" Gaines that THORNE purchased "Hit Man," for breeding from LARON MECCO "FROG" WEST after WEST "rolled" (used as a sparring partner) "Hit Man" against "Cody" (another dog).
3. In a phone conversation on or about October 19, 2015, LARON MECCO "FROG" WEST told unindicted conspirator Anthony "Monte" Gaines that WEST was supplying fighting dogs to RICARDO GLENN "RIP" THORNE.
4. In a phone conversation on or about October 28, 2015, RICARDO GLENN "RIP" THORNE told unindicted conspirator Anthony "Monte" Gaines that THORNE was housing a fighting dog for LARON MECCO "FROG" WEST.
5. In a phone conversation on or about October 28, 2015, RICARDO GLENN "RIP" THORNE told unindicted conspirator Anthony "Monte" Gaines that THORNE had a female fighting dog in heat who had killed two other dogs, and was in demand for breeding.
6. In a phone conversation on or about October 28, 2015, RICARDO GLENN "RIP" THORNE told unindicted conspirator Anthony "Monte" Gaines that THORNE had sold WEST

two fighting dogs, including one who lost “game” and “scratched dead” after a fight that lasted one hour and 37 minutes.

7. In a phone conversation on or about November 9, 2015, RICARDO GLENN “RIP” THORNE told unindicted conspirator Anthony “Monte” Gaines that THORNE was able to make a lot of money from charging admission to dog fights that he held at a warehouse and did it for years but never got popped.

8. In a phone conversation on or about November 10, 2015, RICARDO GLENN “RIP” THORNE told unindicted conspirator Anthony “Monte” Gaines that THORNE had a dog that won three fights at 18 months old, after he “rolled” her as a puppy with a guy in Waldorf.

9. In a phone conversation on or about November 10, 2015, RICARDO GLENN “RIP” THORNE told unindicted conspirator Anthony “Monte” Gaines that THORNE does not drive his own car or bring his work ID with him to a dog fight because that was how other dog fighters had been caught.

10. In and around April 2016, unindicted conspirator Rodriguez Norman asked unindicted conspirator Carlos Harvey to host a dog fight in King George County, Virginia.

11. On or about April 3, 2016, TARRY JERON “TJ” WILSON traveled from Warsaw, Virginia, to attend a dog fight in King George, Virginia, hosted by unindicted conspirator Carlos Harvey.

12. On or about June 1, 2016, DEREK AARON GARCIA notified unindicted conspirator Rodriguez Norman by direct message that unindicted conspirator Anthony “Monte” Gaines was among a group of eight individuals criminally charged with participating in a dogfighting ring.

13. On or about October 23, 2016, DEREK AARON GARCIA ("Fatal Attraction") posted to a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that GARCIA was going to enter his dog "Buggy" in a fight.

14. In and around November 2016, unindicted conspirator Rodriguez Norman entered his dog "Pablo" in a fight that, after 72 minutes, was won by "Pablo."

15. On or about December 13, 2016, DEREK AARON GARCIA ("Fatal Attraction") posted to a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" an offer to sell his fighting dog "Buggy" for \$2,000.

16. In or around mid-December 2016, DEREK AARON GARCIA sold his fighting dog "Buggy" to unindicted conspirator Rodriguez Norman ("Tough Love") for about \$1700.

17. On or about March 7, 2017, in response to an inquiry posted on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" by DEREK AARON GARCIA ("Fatal Attraction") regarding the status of fighting dog "Buggy", unindicted conspirator Rodriguez Norman ("Tough Love") told GARCIA that Buggy fought well.

18. On or about March 13, 2017, CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") used a direct message to notify unindicted conspirator Rodriguez Norman ("Tough Love") that unindicted conspirator "Big Head" had been arrested.

19. On or about March 13, 2017, unindicted conspirator Rodriguez Norman ("Tough Love") messaged CHARLES EDWARD "CHUCKY" WILLIAMS, III that, in light of the arrest of "Big Head", TARRY JERON "TJ" WILSON should delete messages from the private group on the Telegram app generally referenced as "The DMV Board" or "The Board".

20. On or about March 13, 2017, CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") messaged Norman ("Tough Love") that DEREK AARON GARCIA ("Fatal

Attraction”) told TARRY JERON “TJ” WILSON (“City Limits”) to delete the messages from the private group on the Telegram app generally referenced as “The DMV Board” or “The Board”.

21. On or about March 13, 2017, DEREK AARON GARCIA (“Fatal Attraction”) instructed TARRY JERON “TJ” WILSON (“City Limits”) how to delete the messages on the private group on the Telegram app generally referenced as “The DMV Board” or “The Board” without deleting the group from the Telegram app.

22. On or about March 13, 2017, unindicted conspirator Rodriguez Norman (“Tough Love”) messaged members of a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” that, because the messages on the Board then in use by the conspirators could not be deleted without deleting the entire group from the Telegram app, the group would have to be deleted and a new one created on the app.

23. On or about June 4, 2017, CHARLES EDWARD “CHUCKY” WILLIAMS, III (“Never Say Never”) posted to an on-line website tracking pedigrees of fighting dogs a page with a photo and information for his fighting dog “Never Say Never Fish Grease” characterizing the dog as a two-time winner, having defeated Urban City’s “Lulu” and COTC’s “Mobetta”.

24. On or about June 18, 2017, RICARDO GLENN “RIP” THORNE (“Darkside”) posted to a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” a description of a fighting dog that had won over \$50,000, and noted that the most that he himself had ever won at one show was \$15,000.

25. On or about June 18, 2017, RICARDO GLENN “RIP” THORNE (“Darkside”) posted to a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” a solicitation to arrange a fight for a 35-pound male dog.

26. On or about June 18, 2017, DEREK AARON GARCIA ("Fatal Attraction") posted to a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" a detailed description of a dog fight he attended between "Hot Mouth Kennel's" "Alibaba" and "DRK's" "Shake", that lasted two hours and 34 minutes.

27. On or about June 19, 2017, DEREK AARON GARCIA ("Fatal Attraction") posted on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" bets of \$100 each of two dog fights.

28. On or about June 20, 2017, LARON MECCO "FROG" WEST ("Get Sick") posted on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that "we kill" fighting dogs that quit.

29. On or about June 23, 2017, LARON MECCO "FROG" WEST ("Get Sick") posted on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" an offer of \$2000 for a fight with a 36-pound female or a 41-pound male dog.

30. On or about June 23, 2017, DEREK AARON GARCIA ("Fatal Attraction") posted to a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" a news article on the conviction of a defendant in a dogfighting case in Erie, Pennsylvania.

31. On or about June 25, 2017, DEREK AARON GARCIA ("Fatal Attraction") notified the members of a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that he had posted on Facebook a "play-by-play" of a dog fight he and other conspirators attended, that was won by the dog "Eulogy" in one hour and 59 minutes.

32. In a phone conversation on or about July 26, 2017, unindicted conspirator Rodriguez Norman asked CHARLES EDWARD "CHUCKY" WILLIAMS, III if WILLIAMS was going to attend a dogfight on July 29, 2017.

33. In a phone conversation on or about July 26, 2017, unindicted conspirator Norman told CHARLES EDWARD "CHUCKY" WILLIAMS, III that an unindicted conspirator was training a 38-pound dog for Norman to enter in a fight, and that such individual had previously trained a champion fighting dog that, in one fight, fought for three hours and 16 minutes.

34. On or about July 29, 2017, CHARLES EDWARD "CHUCKY" WILLIAMS, III traveled to Nanjemoy, Maryland, to watch the dog fights scheduled to occur that day, including one involving a dog owned by unindicted conspirator Rodriguez Norman.

35. On or about July 29, 2017, unindicted conspirator Rodriguez Norman entered his dog "Pyrex" in a fight in Nanjemoy, Maryland, in place of his fighting dog "Pablo," because Pablo was injured, and Norman did not want to lose the "forfeit" fee.

36. In a phone conversation on or about July 30, 2017, RICARDO GLENN "RIP" THORNE told unindicted conspirator Rodriguez Norman that THORNE was going to place bets on one of Norman's dogs.

37. In a phone conversation on or about July 30, 2017, unindicted conspirator Rodriguez Norman asked CHARLES EDWARD "CHUCKY" WILLIAMS, III to train Norman's fighting dog "Bruiser" while unindicted conspirator Norman was out of town.

38. In a phone conversation on or about August 2, 2017, DEREK AARON GARCIA agreed to watch Norman's fighting dogs for Norman while unindicted conspirator Rodriguez Norman went to Las Vegas.

39. In a phone conversation on or about August 2, 2017, GARCIA told unindicted conspirator Rodriguez Norman that GARCIA had a 37-pound female he wanted to enter into a fight, but that GARCIA probably would fight the dog in New Jersey or the Carolinas because none of the members of the DMV Board had a female dog of the right weight for his dog to fight.

40. In a phone conversation on or about August 3, 2017, unindicted conspirator Rodriguez Norman and DEREK AARON GARCIA discussed fighting dogs Pablo, Bruiser, and dogfighting.

41. In a phone conversation on or about August 3, 2017, unindicted conspirator Rodriguez Norman and RICARDO GLENN "RIP" THORNE discussed a dog fight in North Carolina that SHABORN AMAR "SHY" NESBITT was going to host for Norman.

42. In a phone conversation on or about August 6, 2017, CHARLES EDWARD "CHUCKY" WILLIAMS, III asked unindicted conspirator Rodriguez Norman to post a proposed fight for a 44-pound male dog for \$5,000, and a 35-pound female dog for \$1,500.

43. In a phone conversation on or about August 12, 2017, CHARLES EDWARD "CHUCKY" WILLIAMS, III contacted unindicted conspirator Rodriguez Norman to find a dog to fight with WILLIAMS's 51-pound male dog.

44. On or about August 19, 2017, unindicted conspirator Carlos Harvey spoke by phone with unindicted conspirator Rodriguez Norman.

45. On or about August 19, 2017, unindicted conspirator Rodriguez Norman spoke by phone with SHABORN AMAR "SHY" NESBITT.

46. In a phone conversation on or about August 20, 2017, LARON MECCO "FROG" WEST told unindicted conspirator Rodriguez Norman that WEST had failed in an attempt to purchase a particular fighting dog because, after WEST asked the seller to show WEST the dog in a dog fight, the dog fought so well that the seller raised the price more than the original amount that WEST had agreed to pay.

47. In a phone conversation on or about August 21, 2017, unindicted conspirator Rodriguez Norman discussed breeding dogs with RICARDO GLENN "RIP" THORNE.

48. On or about August 24, 2017, at a premises on St. Clair Drive, in Temple Hills, Maryland, unindicted conspirator Norman possessed three fighting dogs (one wearing a collar weighted with a sandbag); three pitbull puppies; and numerous items associated with an illegal animal fighting venture, including a treadmill with a hook to keep a dog on it; a fighting ring bearing traces of non-primate blood; syringe boxes; boxes of needles; a skin-staple pack; an IV-fluid kit; and performance enhancing pharmaceuticals commonly used to increase fighting potential in dogs trained for fighting, as well as to keep injured dogs fighting longer.

49. On or about August 24, 2017, at a premises on Brothers Place, S.E., in Washington, D.C., unindicted conspirator Norman possessed seven fighting dogs, and numerous items associated with animal fighting, including lunge whips; dog pharmaceuticals; syringes; shock collars; chains; stakes; and skin-staple packs.

50. On or about January 2, 2018, LARON MECCO "FROG" WEST posted to an on-line website tracking pedigrees of fighting dogs a page with a photo and information for his fighting dog "GET SICK'S H.I.V.", characterizing the dog as the offspring of "Tough Love's Big Bruiser 1XW".

51. On or about March 10, 2018, LARON MECCO "FROG" WEST drove CHARLES EDWARD "CHUCKY" WILLIAMS, III to a warehouse on South 35th Street in Philadelphia, Pennsylvania, where WILLIAMS entered his dog into a dogfight attended by dozens of people.

52. In or about July 2018, LARON MECCO "FROG" WEST kept one of his fighting dogs at property controlled by unindicted conspirator Carlos Harvey.

53. On or about July 11, 2018, unindicted conspirator Carlos Harvey possessed at his residence 11 pit bull-type dogs, most of whom had scarring consistent with a dog fighting venture.

54. On or about August 30, 2018, after unindicted conspirator Carlos Harvey obtained a new phone to replace the one seized from him by law enforcement, LARON MECCO "FROG" WEST approved Harvey to rejoin the private Telegram group generally referenced as "The DMV Board" or "The Board" through Harvey's new phone number.

55. In a phone conversation on or about September 2, 2018, LARON MECCO "FROG" WEST discussed with Carlos Harvey a dogfight about which WEST had just learned.

56. On or about October 15, 2018, TARRY JERON "TJ" WILSON ("City Limits") posted to a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" a photo in prison of unindicted conspirator Rodriguez Norman, and a solicitation for fights for a 37-pound male dog and a 33-pound female dog.

57. On or about October 17, 2018, TARRY JERON "TJ" WILSON ("City Limits") provided on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" instructions to another dogfighter on how to kill their losing dog and offered to drive to the other dogfighter's house to hang the dog from a tree himself.

58. On or about October 17, 2018, LARON MECCO "FROG" WEST ("Get Sick") notified a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that dogs that failed to fight aggressively enough had been killed. According to WEST:

I love to throw the motherfuckers over the bridge into the water. But, uh, nah, you know, he lived too far. I ain't want to ride the motherfucking mutt with me just to throw it to the bridge. If they was closer, I would've went to the bridge and throw me over that mother fucker for sure.

59. On or about October 17, 2018, TARRY JERON "TJ" WILSON ("City Limits") told LARON MECCO "FROG" WEST on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that the other dogfighter should have invited WILSON to come to his dog yard to kill the dogs, because, as WILSON said, he "loved" killing them, "[i]ts

like I'm killing somebody, man. I'll unplug it and hook them up. Unplug it and hook them up. I like killing motherfuckers. Them motherfuckers taking my money, feeding them food, taking my antibiotics and in my yard taking my deck."

60. On or about October 17, 2018, defendant TARRY JERON "TJ" WILSON ("City Limits") stated on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that WILSON wanted to arrange a fight with two of their dogs in the weight range of 30 to 38 pounds.

61. On or about October 18, 2018, CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") agreed on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" to referee a dogfight.

62. On or about October 24, 2018, RICARDO GLENN "RIP" THORNE ("Darkside") posted on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" an offer to arrange fights for his 36-pound male dog and his 40-pound male dog.

63. During a discussion on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" on or about October 26, 2018, DEREK AARON GARCIA ("Fatal Attraction") and SHABORN AMAR "SHY" NESBITT ("The God I Am") advised unindicted conspirator "Andrew Dirttown" regarding the merits of acquiring the offspring of a fighting dog known as "Brooklyn", owned by a partner of unindicted conspirator Rodriguez Norman ("Tough Love").

64. On or about October 30, 2018, SHABORN AMAR "SHY" NESBITT ("The God I Am") asked on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" whether RICARDO GLENN "RIP" THORNE ("Darkside") had posted on-line that he had a 41-pound male that he wanted to fight for \$5,000.

65. On or about October 30, 2018, RICARDO GLENN "RIP" THORNE ("Darkside") told SHABORN AMAR "SHY" NESBITT ("The God I Am") on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that THORNE already had a fight arranged for a 40-pound male for \$5,000.

66. On or about November 2, 2018, TARRY JERON "TJ" WILSON ("City Limits") warned members of the a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" to be sure to confirm the death of the dogs that they try to kill upon losing a fight, because one time he and CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") thought that their dog had died in a fight, only to find that the dog returned to life; "we broke the box down, balled up the carpet . . . carry her out of the woods, put her in the truck. She wake up. I swear to God"

67. On or about November 3, 2018, TARRY JERON "TJ" WILSON ("City Limits") told members of a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that he had a 37-pound male dog available to fight.

68. On or about November 4, 2018, MICHAEL ROY HILLIARD ("No Dayz") told a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that he was interested in purchasing a 13–14-month-old female dog that already had been trained for fighting.

69. In a phone conversation no or about December 2018, TARRY JERON "TJ" WILSON told Carlos Harvey about his plans to arrange a dogfight in January 2019, in Delaware.

70. On or about January 2, 2019, RICARDO GLENN "RIP" THORNE ("Darkside") advised a private group on the Telegram app generally referenced as "The DMV Board" or "The

Board” that Darkside Kennels had been around for over 20 years, and that newer dogfighters should learn some “dogman etiquette.”

71. On or about January 2, 2019, SHABORN AMAR “SHY” NESBITT (“The God I Am”) told a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” that he “[j]ust won with three dogs. Got three dogs hooked right now too. Then when I get finished with those three, I have three more to hook. So whenever you get them weights, you just let me know.”

72. On or about January 2, 2019, SHABORN AMAR “SHY” NESBITT (“The God I Am”) told a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” that NESBITT did not need THORNE’s advice, because NESBITT had “been in the game for 15 years, bro.”

73. On or about January 17, 2019, MICHAEL ROY HILLIARD (“No Dayz”) asked on a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” how TARRY JERON “TJ” WILSON was looking for an event on Saturday.

74. On or about January 17, 2019, in response to a news article posted to a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” regarding an individual charged with running a dogfighting operation, TARRY JERON “TJ” WILSON (“City Limits”) warned “People like dogs. They don’t like what we doing to them, though, I bet you that.”

75. On or about January 19, 2019, in response to a question by a member of a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” regarding the correct procedure for a referee to follow at a dog fight, DEREK AARON GARCIA (“Fatal Attraction”) posted on DMV Board the correct procedure for a referee to act in a dogfight, with

which CHARLES EDWARD “CHUCKY” WILLIAMS, III (“Never Say Never”) and SHABORN AMAR “SHY” NESBITT (“The God I Am”) agreed.

76. On or about January 19, 2019, CHARLES EDWARD “CHUCKY” WILLIAMS, III (“Never Say Never”) complained on a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” that unindicted conspirator “Big Fist” was putting a “play-by-play” of a fight between dogs owned by “Big Fist” and TARRY JERON “TJ” WILSON (“City Limits”) on the wrong board.

77. On or about January 19, 2019, at approximately 11:10 p.m., in response to a question posed by LARON MECCO “FROG” WEST (“Get Sick”) as to whether the fight involving WILSON’s dog was yet over, unindicted conspirator “Big Fist” told a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” that there were no “fat ladies yet,” meaning the fight was not over yet.

78. On or about January 19, 2019, after his dog lost a fight in Delaware that lasted one hour and 12 minutes, TARRY JERON “TJ” WILSON (“City Limits”) shot and killed the dog after she thwarted his attempt to electrocute her.

79. On or about January 20, 2019, CHARLES EDWARD “CHUCKY” WILLIAMS, III (“Never Say Never”) congratulated TARRY JERON “TJ” WILSON (“City Limits”) on a private group on the Telegram app generally referenced as “The DMV Board” or “The Board” for entering his dog in the fight the previous night.

80. In a phone conversation on or about February 3, 2019, LARON MECCO “FROG” WEST (“Get Sick”) told Carlos Harvey that WEST was trying to obtain a new 39- or 40-pound dog to enter into a fight in June 2019.

81. On or about February 8, 2019, DEREK AARON GARCIA ("Fatal Attraction") encouraged unindicted conspirator "4Bhead" on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" to support unindicted conspirator "Abstract" in an upcoming dogfight.

82. During a discussion on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" on or about February 8, 2019, DEREK AARON GARCIA ("Fatal Attraction") offered to bet conspirator "4BHead" \$100 that a dog fight involving a dog belonging to conspirator "Abstract" would last at least 30 minutes.

83. During a discussion on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" on or about February 10, 2019, DEREK AARON GARCIA ("Fatal Attraction"), CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never"), and SHABORN AMAR "SHY" NESBITT ("The God I Am") watched and discussed on the DMV Board a dog fight won by a dog owned by unindicted conspirator "Abstract."

84. On or about February 10, 2019, CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") told a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that one of the dogs of MICHAEL ROY HILLIARD ("No Dayz") was real "high intense", "made all his spots," and was going to "be alright."

85. On or about April 6, 2019, CHARLES EDWARD "CHUCKY" WILLIAMS, III, MICHAEL ROY HILLIARD, and Carlos Harvey drove through Fairfax, Prince William, and Stafford Counties along I-95 in Virginia, with a dog belonging to WILLIAMS, so that WILLILAMS could enter the dog in a dog fight in Bunnlevel, North Carolina.

86. On or about April 6, 2019, in Bunnlevel North Carolina, CHARLES EDWARD "CHUCKY" WILLIAMS, III, entered his dog in a dog fight that was referred by SHABORN AMAR "SHY" NESBITT, and attended by, among others, MICHAEL ROY HILLIARD and Carlos Harvey.

87. On or about April 6, 2019, after a dog fight that lasted less than 10 minutes before being won by the dog belonging to CHARLES EDWARD "CHUCKY" WILLIAMS, III, an unindicted conspirator shot and killed the dog that lost the fight.

88. In a phone conversation on or about May 28, 2019, LARON MECCO "FROG" WEST told Carlos Harvey of his attempt to schedule a dog fight with an individual who kept changing the timing of the fight.

89. On or about June 4, 2019, MICHAEL ROY HILLIARD ("No Dayz") told CHARLES EDWARD "CHUCKY" WILLIAMS, III ("Never Say Never") on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" that HILLIARD wanted to travel to North Carolina to attend WILLIAMS's next dog fight.

90. During a discussion on a private group on the Telegram app generally referenced as "The DMV Board" or "The Board" on or about June 4, 2019, TARRY JERON "TJ" WILSON ("City Limits") solicited fights for a 44-pound female dog and a 48 to 50-pound male dog.

91. On or about June 15, 2019, CHARLES EDWARD "CHUCKY" WILLIAMS, III attended a dogfight in Woodbridge, Virginia, between dogs owned by unindicted conspirators "Abstract" and "Deep in the Game."

92. On or about June 19, 2019, defendant TARRY JERON "TJ" WILSON possessed dogfighting materials at his residence in Warsaw, Virginia.

93. On or about July 23, 2019, LARON MECCO "FROG" WEST trained his fighting dog "Lil Charlie" at the house of RICARDO GLENN "RIP" THORNE, in Camp Springs, Maryland, in preparation for a dog fight in Delaware on August 3, 2019.

94. In a phone conversation on or about July 24, 2019, LARON MECCO "FROG" WEST told Carlos Harvey how WEST has his fighting dogs on steroids.

95. On or about July 30, 2019, RICARDO GLENN "RIP" THORNE possessed at his residence in Camp Springs, Maryland, dog fighting instruments including breeding stands, flirt poles, medical aid materials, dog pedigree information, scales and weighted collars, and nine Pit Bull type dogs, many with scarring patterns and lacerations consistent with animal fighting.

96. On or about November 21, 2019, DEREK AARON GARCIA secured a dog to a treadmill for purposes of building up its strength and stamina for a dog fight.

97. On or about August 20, 2020, TARRY JERON "TJ" WILSON possessed at his residence in Warsaw, Virginia, eight pit-bull type dogs (including four that bore scarring patterns that indicated previous involvement in dogfighting), and a cell phone containing nine videos depicting WILSON engaged in dogfighting, including two depicting CHARLES EDWARD "CHUCKY" WILLIAMS, III engaged in dog fighting.

(All in violation of Title 18, United States Code, Section 371.)

COUNTS TWO THROUGH FOUR*(Handling Dogs for Participation in an Animal Fighting Venture)*

A. The general allegations of this Indictment are re-alleged and incorporated into this Count as though fully set forth herein, as well as the Overt Acts referenced below.

B. On or about the following dates, in the locations listed below in the Eastern District of Virginia and elsewhere, the following defendants did unlawfully and knowingly possess, train, transport, deliver, and receive dogs for purposes of having the dogs participate in an animal fighting venture, as referenced in the Overt Acts listed below:

Count	Defendant(s)	Date	Location	Overt Act(s)
2	LARON MECCO "FROG" WEST	July 2018	King George County, Virginia	52
3	TARRY JERON "TJ" WILSON	January 19, 2019	Warsaw, Virginia	76-79
4	CHARLES EDWARD "CHUCKY" WILLIAMS, III	April 6, 2019	Fairfax, Prince William, and Stafford Counties, Virginia	85-87

(All in violation of Title 7, United States Code, Section 2156(b), and Title 18; United States Code, Section 49.)

COUNT FIVE

(Advertising a Dog For Use in an Animal Fighting Venture)

A. The general allegations of this Indictment are re-alleged and incorporated into this Count as though fully set forth herein.

B. On or about October 30, 2018, in Woodbridge in the Eastern District of Virginia and elsewhere, defendant RICARDO GLENN "RIP" THORNE did unlawfully and knowingly use an instrumentality of interstate commerce for commercial speech for purposes of advertising an animal for use in an animal fighting venture, promoting or in any other manner furthering an animal fighting venture, by making the following advertisement on the Internet through the Telegram app, to wit, THORNE offered \$5000 for a fight for a 41-pound dog.

(All in violation of Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49.)

A TRUE BILL:

Pursuant to the E-Government Act.,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON OF THE GRAND JURY

Jessica D. Aber
United States Attorney

By:



Gordon D. Kromberg
Assistant United States Attorney